

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:) **17-32479**
)
EDMOND PRYOR,) **Chapter 13**
)
Debtor.) **Hon. Judge: COX**

NOTICE OF MOTION

To the following persons or entities who have been served via electronic mail:

U.S. Bankruptcy Trustee: USTPRegion11.ES.ECF@usdoj.gov

Tom Vaughn, Chapter 13 Trustee: ecf@tvch13.net

To the following persons or entities who have been served via U.S. Mail:

See attached list.

Please take notice that I shall appear before the following named Bankruptcy Judge, or any other Judge presiding in his or her stead at 219 S. Dearborn Street, Chicago, IL 60604, and in the following courtroom (or any other place posted), and present the attached **Motion to Modify Chapter 13 Plan**, at which time and place you may appear.

JUDGE: COX
ROOM: 680
DATE: September 16, 2019
TIME: 9:00 AM

PROOF OF SERVICE

The undersigned certifies that copies of this Notice and attachments were served to the listed persons or entities, if service by mail was indicated above, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, on or before August 26, 2019, at 5:30 p.m., with proper postage prepaid, unless a copy was provided electronically by the Bankruptcy Court.

DATE OF SERVICE: August 26, 2019

/s/ Robert C. Bansfield Jr.

Robert C. Bansfield Jr., A.R.D.C. #6329415

Attorney for the Debtor(s)
DAVID M. SIEGEL & ASSOCIATES
790 Chaddick Drive
Wheeling, IL 60090
(847) 520-8100

To the following persons or entities who have been served via U.S. Mail:

Edmond Pryor
3344 W. Van Buren, 1st Floor
Chicago, IL 60624

IL Dept. of Revenue Bankruptcy Section
PO Box 19035
Springfield, IL 62794-9035

City of Chicago Department of Finance
c/o Arnold Scott Harris P.C.
111 W Jackson Blvd Ste.600
Chicago IL.60604

Commonwealth Edison Company
Bankruptcy Department
1919 Swift Drive
Oakbrook, IL 60523

Prestige Financial Services
BANKRUPTCY DEPT
PO BOX 26707
Salt Lake City UT 84126

Educational Credit Management
Corporation
P.O. Box 16408
Saint Paul, MN 55116-0408

The Illinois Tollway
PO Box 5544
Chicago IL 60680

Crest Financial
61 West 13490 South
Draper, UT 84020

IRS
Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

AmeriCash Loans, L.L.C.
P.O. Box 184
Des Plaines, IL 60016

PEOPLES GAS LIGHT & COKE
COMPANY
200 EAST RANDOLPH STREET
CHICAGO, ILLINOIS 60601

Jefferson Capital Systems LLC
PO Box 7999
St Cloud MN 56302-9617

US DEPT OF EDUCATION
CLAIMS FILING UNIT
PO BOX 8973
MADISON, WI 53708-8973

**UNITED STATES BANKRUPTCY COURT
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In Re:) **17-32479**
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EDMOND PRYOR,) **Chapter 13**
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Debtor.) **Hon. Judge: COX**

MOTION TO MODIFY CHAPTER 13 PLAN

NOW COMES the Debtor, **EDMOND PRYOR**, by and through his attorneys, David M. Siegel & Assoc., LLC, to present this Motion, and in support thereof states as follows:

- 1) This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois Eastern Division.
- 2) Debtor filed a petition for relief under Chapter 13 of Title 11 USC on October 30, 2017.
- 3) The current plan requires payments of \$700.00, per month with General Unsecured Creditors receiving not less than 10% of allowed claims.
- 4) Debtor is currently in default on his plan payments because he works for City Colleges of Chicago as a coach and is only paid during the school year when school is in session.
- 5) Debtor is able to make his current plan payments because school is back in session but is not able to cure the default.
- 6) Debtor seeks to modify his plan under 11 U.S.C. § 1329, increase his monthly payment in order for their Chapter 13 plan to complete in 60 months, and repay the current default over the remaining span of the plan. This will increase the monthly payment to \$820.00 per month.
- 7) Debtor will be able to afford the increase in his monthly payments by decreasing his costs on various expenses.

- 8) The plan will complete within 60 months if the Debtor's motion is granted and unsecured creditors will still receive no less than 10% of their allowed claims.
- 9) Debtor requests the above relief without any intent to defraud his creditors.

WHEREFORE, the Debtor, EDMOND PRYOR, prays that this Honorable Court enter an Order to Modify the Chapter 13 Plan and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Robert C. Bansfield Jr.
Robert C. Bansfield Jr., A.R.D.C. #6329415
Attorney for the Debtor

David M. Siegel & Associates, LLC
790 Chaddick Drive
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